STATE OF CALIFORNIA Gavin Newsom, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 6, 2025 EA2024-1276

Melvin Stark
Principle Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

Subject: Audit of Southern California Edison's Palm Springs District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Palm Springs District from October 28, 2024 to November 1, 2024. The audit included a review of SCE's records and field inspections of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than March 6, 2025, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or James.Miller@cpuc.ca.gov.

Sincerely,

Fadi Daye

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation Records

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 165, Section III-B, Distribution Facilities, Standards for Inspection, states:

> *Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.*

GO 95, Rule 31.2, Inspection of Lines, states in part:

> *Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

SCE's records indicated that from calendar year 2021 through August 2024, SCE had 3376 overhead detailed inspections and 30 above ground patrol inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time of the audit.

GO 165, Section III-B, Distribution Facilities, Standards for Inspection, states:

> *Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.*

GO 128, Rule 17.2, Inspection, states:

> *Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.*

SCE's records indicated that from calendar year 2021 through August 2024, SCE had 2620 underground detailed inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time of the audit.

GO 95, Rule 18-B1, Maintenance Programs, states in part:

> *Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate …*

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

> *For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

SCE's records indicated that from August 2023 through July 2024, SCE completed 337 overhead work orders past SCE's due date for corrective action. Additionally, as of July 31, 2024, SCE had 59 open overhead work orders that were past SCE's scheduled due date for corrective action.

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

> *Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

SCE's records indicated that from August 2023 through July 2024, SCE completed 229 underground work orders past SCE's due date for corrective action. Additionally, as of July 31, 2024, SCE had 195 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	4915355E	Pole	Cathedral City
2	26508CWT	Pole	Cathedral City
3	4883358E	Pole	Cathedral City
4	4894595E	Pole	Cathedral City
5	4894595E	Pole	Cathedral City
6	79609S	Pole	Cathedral City
7	4824382E	Pole	Cathedral City
8	4372842E	Pole	Cathedral City
9	4826090E	Pole	Cathedral City
10	4826091E	Pole	Cathedral City
11	4826089E	Pole	Cathedral City
12	4419851E	Pole	Cathedral City
13	4131517E	Pole	Cathedral City
14	34264	Pole	Cathedral City
15	4850736E	Pole	Cathedral City
16	464769E	Pole	Cathedral City
17	332606S	Pole	Cathedral City
18	34266S	Pole	Cathedral City
19	34020S	Pole	Cathedral City
20	4466532E	Pole	Cathedral City
21	4622899E	Pole	Cathedral City
22	4823971E	Pole	Desert Hot Springs
23	4376236E	Pole	Desert Hot Springs
24	2205064E	Pole	Desert Hot Springs
25	2205063E	Pole	Desert Hot Springs
26	2152400E	Pole	Desert Hot Springs
27	2152399E	Pole	Desert Hot Springs
28	2152398E	Pole	Desert Hot Springs
29	4376234E	Pole	Desert Hot Springs
30	2152264E	Pole	Desert Hot Springs
31	4376232E	Pole	Desert Hot Springs
32	4376231E	Pole	Desert Hot Springs
33	4376230E	Pole	Desert Hot Springs
34	4322754E	Pole	Desert Hot Springs
35	4323126E	Pole	Desert Hot Springs
36	4269504E	Pole	Desert Hot Springs
37	4269503E	Pole	Desert Hot Springs
38	4269502E	Pole	Desert Hot Springs

39	2190156E	Pole	Desert Hot Springs
40	4213022E	Pole	Desert Hot Springs
41	4648620E	Pole	Desert Hot Springs
42	356701	Pole	Desert Hot Springs
43	2130221E	Pole	Desert Hot Springs
44	1593163E	Pole	Desert Hot Springs
45	Tagless Pole on 35th Ave. & Marcia Rd.	Pole	Palm Springs
46	1554801E	Pole	Palm Springs
47	1963836E	Pole	Palm Springs
48	1554811E	Pole	Palm Springs
49	1554814E	Pole	Palm Springs
50	1554818E	Pole	Palm Springs
51	57431S	Pole	Palm Springs
52	1554812E	Pole	Palm Springs
53	2028583E	Pole	Palm Springs
54	4826087E	Pole	Palm Springs
55	4358122E	Pole	Palm Springs
56	2097298E	Pole	Palm Springs
57	4625812E	Pole	Palm Springs
58	2205241E	Pole	Palm Springs
59	4410913E	Pole	Whitewater
60	57959S	Pole	Whitewater
61	4131544E	Pole	Whitewater
62	4631747E	Pole	Whitewater
63	4036287E	Pole	Whitewater
64	4036288E	Pole	Whitewater
65	4036289E	Pole	Whitewater
66	4036290E	Pole	Whitewater
67	4036291E	Pole	Whitewater
68	4036292E	Pole	Whitewater
69	4937385E	Pole	Whitewater
70	4036293E	Pole	Whitewater
71	4430598E	Pole	Whitewater
72	4036294E	Pole	Whitewater
73	4036295E	Pole	Whitewater
74	4036296E	Pole	Whitewater
75	4036297E	Pole	Whitewater
76	4435410E	Pole	Whitewater
77	4323494E	Pole	Cabazon
78	4233011E	Pole	Cabazon
79	1570697E	Pole	Cabazon
80	4949129E	Pole	Cabazon
81	4944253E	Pole	Cabazon

82	4949146E	Pole	Cabazon
83	4888750E	Pole	Cabazon
84	4913436E	Pole	Cabazon
85	2351063E	Pole	Cabazon
86	4131144E	Pole	Cabazon
87	2351054E	Pole	Cabazon
88	4383430E	Pole	Cabazon
89	4429711E	Pole	Cabazon
90	4429712E	Pole	Cabazon
91	4383431E	Pole	Cabazon
92	2329013	Pole	Palm Springs
93	4269526E	Pole	Desert Hot Springs
94	4938684E	Pole	Cathedral City
95	4215571E	Pole	Rancho Mirage
96	257970S	Pole	Cathedral City
97	1730566E	Pole	Palm Springs
98	P5740152	Padmounted Transformer	Palm Desert
99	P5740153	Padmounted Transformer	Palm Desert
100	P5740154	Padmounted Transformer	Palm Desert
101	P5740155	Padmounted Transformer	Palm Desert
102	P5740156	Padmounted Transformer	Palm Desert
103	P5740157	Padmounted Transformer	Palm Desert
104	B5171050	BURD Transformer	Indian Wells
105	V5170873	Vault with Gas Switch	Indian Wells
106	B5171038	BURD Transformer	Indian Wells
107	B5171039	BURD Transformer	Indian Wells
108	P5483028	Padmounted Transformer	Rancho Mirage
109	P5511406	Padmounted Transformer	Rancho Mirage
110	P5700779	Padmounted Transformer	Rancho Mirage
111	P5730581	Padmounted Transformer	Rancho Mirage
112	P5505074	Padmounted Switch	Rancho Mirage
113	P5420024	Padmounted Transformer	Cabazon
114	P5420023	Padmounted Transformer	Cabazon
115	P5625261	Padmounted Transformer	Cabazon
116	P5625260	Padmounted Switch	Cabazon

IV. Field Inspection Violations List

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use, states in part:

> *Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44 .*

A down guy wire attached to each of the following poles was not taut:

- 4372842E
- 4850736E
- 4036293E
- 4430598E
- 4913436E

GO 95, Rule 34, Foreign Attachments, states in part:

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

Unauthorized foreign attachments were observed on the following poles:

- Pole No. 4376232E had an unauthorized chain attached to it. The chain had presumably been installed by the property owner as a means of holding a gate open.
- Pole No. 4264520E had an unauthorized sign attached to it advertising the services of a local realtor.

GO 95, Rule 31.1, Design Construction and Maintenance, states in part:

> *Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The following overhead facilities required maintenance:

- A pair of shoes, tied together by their laces, hung from a primary conductor near Pole No. 4915355E.
- A guy guard on Pole No. 4850736E was damaged.
- A section of split tubing, also known as “spaghetti,” had become detached from a primary conductor on Pole No. 4322754E.
- A guy anchor attached to Pole No. 1554801E was damaged.
- The visibility strips on Pole Nos. 4824382E, 1863836E, and 2097298E were damaged.

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communications conductors supported on the same pole to be three inches.

An SCE down guy wire attached to Pole No. 1554811E passed a communications conductor supported on the same pole with a radial clearance of approximately one inch. The same was true at a second location; Pole No. 57959S supported an SCE down guy wire and a communications conductor which passed one another with about an inch of radial clearance.

GO 95, Rule 56.4, Clearances, Section D, From Guys or Span Wires, Subsection (2), Passing and Attached to Same Pole, states:

> *The radial clearance between different guys, different span wires, or different guys and span wires, attached to the same pole shall not be less than 3 inches.*

An SCE down guy wire attached to Pole No. 4883358E was in contact with a communications messenger guy wire supported on the same pole.

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, states in part:

> *Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.*

"High Voltage" signs on each of the following poles were either missing or damaged:

- 1863836E
- 1554814E
- 57431S
- 4826087E
- 2205241E
- 4913436E

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

> *For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.*

Vegetation had encroached upon the working space in front of Structure No. P5741055.